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Of Attorneys for Defendants Captain Ron Bishop, Sgt. Jesse Luna, Deputy Michael Gates, Detective Susan Lambert-Gates, and Multnomah County

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

Portland Division

JOHN F. KOWALZYK, an individual, ,

Plaintiff,

v.

CAPTAIN RON BISHOP; SGT. JESSE LUNA;
DEPUTY MICHAEL GATES; DETECTIVE
SUSAN LAMBERT-GATES; JANE & JOHN
DOES 1-23; AND MULTNOMAH COUNTY
(including Multnomah County Sheriff's Office
and Multnomah County Detention Center),

Defendants.

Civil No. 3:12-CV-1712-AC

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION FOR
EXTENSION OF DISCOVERY AND
PTO DEADLINES**

Plaintiff misrepresented to the Court on September 30, 2014 that his Motion for Extension of Discovery and PTO Deadlines was *Unopposed*. (Docket No. 44). Defendants are opposed to plaintiff's motion and counsel for plaintiff was alerted to defendants' opposition prior

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to filing and again shortly after it was filed. The reasons for defendants' opposition are outlined in detail in the Declaration of Justin D. Gericke that is filed herewith.

DATED this 6th day of October, 2014.

Respectfully submitted,

JENNY M. MADKOUR, COUNTY ATTORNEY
FOR MULTNOMAH COUNTY, OREGON

/s/ Justin D. Gericke

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